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7 Reverend Heber Jentzsch

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

10  
11 HEBER JENTZSCH, )  
12 Plaintiff, ) JUDICIAL COUNCIL  
13 v. ) COORDINATION PROCEEDING  
14 ) NO. 2151  
15 BENT CORYDON, )  
16 Defendant. ) LOS ANGELES SUPERIOR  
17 ) COURT NO. NVC 14274  
18 ) RIVERSIDE SUPERIOR  
19 ) COURT NO. 189 414  
20 ) RESPONSES OF REVEREND  
21 ) HEBER JENTZSCH TO  
22 ) DEFENDANT'S  
23 ) INTERROGATORIES  
24 ) (FOURTH SET)  
25 )  
26 )  
27 )  
28 )

23 Plaintiff Heber Jentzsch responds to defendant Bent  
24 Corydon's "Interrogatories Propounded to Heber Jentzsch (Fourth  
25 Set)," served by mail on December 6, 1988, as follows. By prior  
26 agreement with defendant's counsel, due to plaintiff's present  
27 circumstances, plaintiff's counsel will forward plaintiff's  
28

1 written verification of these responses once plaintiff's counsel  
2 is able to obtain them from plaintiff.

3 Interrogatory No. 68: IDENTIFY any and all DOCUMENTS in  
4 your possession, or known to YOU to exist and in any way  
5 discuss, describe, mention or refer to L. Ron Hubbard's life  
6 and biography, including but not limited to the history of his  
7 life, his developments of Scientology, his military career, his  
8 education, involvement with Black magic, his relationship with  
9 any of his past wives other than Mary Sue Hubbard, his  
10 relationship with L. Ron Hubbard Jr.

11 Response to No. 68: Plaintiff objects to this  
12 interrogatory as it exceeds the limit of 35 interrogatories :  
13 specified by California Code of Civil Procedure section  
14 2030(c)(1). There are no circumstances which warrant a greater  
15 number under Code of Civil Procedure section 2030(c)(2).  
16 Further, plaintiff objects as the interrogatory is vague,  
17 ambiguous, unintelligible, overbroad and burdensome. Plaintiff  
18 further objects on the grounds that the subject matter of the  
19 interrogatory is irrelevant and not calculated to lead to the  
20 discovery of admissible evidence. Plaintiff further objects as  
21 the interrogatory seeks to invade the rights of freedom of  
22 association, religion and privacy under state and federal law.  
23 Further, plaintiff is under no obligation to perform research  
24 for defendant. Last, defendant's request is taken in bad faith,  
25 frivolous and intended solely to harass plaintiff in violation  
26 of California Code of Civil Procedure section 128.5.

27 Interrogatory No. 69: IDENTIFY any and all DOCUMENTS in  
28

1 your possession, or known to YOU to exist and in any way  
2 discuss, describe, mention or refer to policies, directions or  
3 suggestions in handling, combating, or otherwise dealing with  
4 any persons considered to be "Suppressive" or persons considered  
5 to be critics, enemies, or otherwise adverse to the Church of  
6 Scientology and/or its practices. This is to include any such  
7 documents that discuss actions that have taken place, or  
8 specific directions to take place. Also includes "Fair Game."

9       Response to No. 69: Plaintiff objects to this  
10 interrogatory as it exceeds the limit of 35 interrogatories  
11 specified by California Code of Civil Procedure section  
12 2030(c)(1). There are no circumstances which warrant a greater  
13 number under Code of Civil Procedure section 2030(c)(2).  
14 Further, plaintiff objects as the interrogatory is vague,  
15 ambiguous, unintelligible, overbroad and burdensome. Plaintiff  
16 further objects on the grounds that the subject matter of the  
17 interrogatory is irrelevant and not calculated to lead to the  
18 discovery of admissible evidence. Plaintiff further objects as  
19 the interrogatory seeks to invade the rights of freedom of  
20 association, religion and privacy under state and federal law.  
21 Further, plaintiff is under no obligation to perform research  
22 for defendant. Last, defendant's request is taken in bad faith,  
23 frivolous and intended solely to harass plaintiff in violation  
24 of California Code of Civil Procedure section 128.5.

25       Interrogatory No. 70: IDENTIFY any and all DOCUMENTS in  
26 your possession, or known to YOU to exist that in any way  
27 discuss, describe, mention or refer to transmitting information  
28



1 to the media, or third persons, including but not limited to  
2 lying, spreading rumors, black propaganda and "noisy"  
3 investigations of individuals believed to be adverse to the  
4 Church of Scientology and/or its practices.

5       Response to No. 70: Plaintiff objects to this  
6 interrogatory as it exceeds the limit of 35 interrogatories  
7 specified by California Code of Civil Procedure section  
8 2030(c)(1). There are no circumstances which warrant a greater  
9 number under Code of Civil Procedure section 2030(c)(2).  
10 Further, plaintiff objects as the interrogatory is vague,  
11 ambiguous, unintelligible, overbroad and burdensome. Plaintiff  
12 further objects on the grounds that the subject matter of the  
13 interrogatory is irrelevant and not calculated to lead to the  
14 discovery of admissible evidence. Plaintiff further objects as  
15 the interrogatory seeks to invade the rights of freedom of  
16 association, religion and privacy under state and federal law.  
17 Further, plaintiff is under no obligation to perform research  
18 for defendant. Last, defendant's request is taken in bad faith,  
19 frivolous and intended solely to harass plaintiff in violation  
20 of California Code of Civil Procedure section 128.5.

21       Interrogatory No. 71: IDENTIFY any and all DOCUMENTS in  
22 your possession, or known to YOU to exist that in any way  
23 discuss, describe, mention or refer to payments by Religious  
24 Technology Center, Author Services Inc. or any other Church of  
25 Scientology related corporation or entity to L. Ron Hubbard.

26       Response to No. 71: Plaintiff objects to this  
27 interrogatory as it exceeds the limit of 35 interrogatories  
28

1 specified by California Code of Civil Procedure section  
2 2030(c)(1). There are no circumstances which warrant a greater  
3 number under Code of Civil Procedure section 2030(c)(2).  
4 Further, plaintiff objects as the interrogatory is vague,  
5 ambiguous, unintelligible, overbroad and burdensome. Plaintiff  
6 further objects on the grounds that the subject matter of the  
7 interrogatory is irrelevant and not calculated to lead to the  
8 discovery of admissible evidence. Plaintiff further objects as  
9 the interrogatory seeks to invade the rights of freedom of  
10 association, religion and privacy under state and federal law.  
11 Further, plaintiff is under no obligation to perform research  
12 for defendant. Last, defendant's request is taken in bad faith,  
13 frivolous and intended solely to harass plaintiff in violation  
14 of California Code of Civil Procedure section 128.5.

15 Interrogatory No. 72: IDENTIFY any and all DOCUMENTS  
16 located in the ARMSTRONG file that in any way discuss, describe,  
17 mention or refer to L. Ron Hubbard's life and biography,  
18 including but not limited to the history of his life, his  
19 developments of Scientology, his military career, his education,  
20 involvement with Black magic, his relationship with any of his  
21 past wives other than Mary Sue Hubbard, his relationship with L.  
22 Ron Hubbard Jr.

23 Response to No. 72: Plaintiff objects to this  
24 interrogatory as it exceeds the limit of 35 interrogatories  
25 specified by California Code of Civil Procedure section  
26 2030(c)(1). There are no circumstances which warrant a greater  
27 number under Code of Civil Procedure section 2030(c)(2).  
28

1 Further, plaintiff objects as the interrogatory is vague,  
2 ambiguous, unintelligible, overbroad and burdensome. Plaintiff  
3 further objects on the grounds that the subject matter of the  
4 interrogatory is irrelevant and not calculated to lead to the  
5 discovery of admissible evidence. Plaintiff further objects as  
6 the interrogatory seeks to invade the rights of freedom of  
7 association, religion and privacy under state and federal law.  
8 Further, plaintiff is under no obligation to perform research  
9 for defendant. Last, defendant's request is taken in bad faith,  
10 frivolous and intended solely to harass plaintiff in violation  
11 of California Code of Civil Procedure section 128.5. Without  
12 waiving the foregoing objections, plaintiff has no knowledge of  
13 or access to the court file in Church of Scientology of  
14 California v. Armstrong, Los Angeles Superior Court No.  
15 C420153 or documents related to the subject matter of that  
16 litigation.

17 Further, defendant's request is interposed in bad faith, as  
18 defendant has full and complete access to the "Armstrong file"  
19 and indeed, Corydon and his attorney submitting these  
20 interrogatories have had exclusive access to said file by  
21 order of the Armstrong court.

22 Interrogatory No. 73: IDENTIFY any and all DOCUMENTS  
23 located in the ARMSTRONG file that in any way discuss, describe,  
24 mention or refer to policies, directions or suggestions in  
25 handling, combating, or otherwise dealing with any persons  
26 considered to be "Suppressive" or persons considered to be  
27 critics, enemies, or otherwise adverse to the Church of  
28



1 Scientology and/or its practices. This is to include any such  
2 documents that discuss actions that have taken place, or  
3 specific direction to take place. Also includes "Fair Game."

4       Response to No. 73: Plaintiff objects to this  
5 interrogatory as it exceeds the limit of 35 interrogatories  
6 specified by California Code of Civil Procedure section  
7 2030(c)(1). There are no circumstances which warrant a greater  
8 number under Code of Civil Procedure section 2030(c)(2).  
9 Further, plaintiff objects as the interrogatory is vague,  
10 ambiguous, unintelligible, overbroad and burdensome. Plaintiff  
11 further objects on the grounds that the subject matter of the  
12 interrogatory is irrelevant and not calculated to lead to the  
13 discovery of admissible evidence. Plaintiff further objects as  
14 the interrogatory seeks to invade the rights of freedom of  
15 association, religion and privacy under state and federal law.  
16 Further, plaintiff is under no obligation to perform research  
17 for defendant. Last, defendant's request is taken in bad faith,  
18 frivolous and intended solely to harass plaintiff in violation  
19 of California Code of Civil Procedure section 128.5. Without  
20 waiving the foregoing objections, plaintiff has no knowledge of  
21 or access to the court file in Church of Scientology of  
22 California v. Armstrong, Los Angeles Superior Court No.  
23 C420153 or documents related to the subject matter of that  
24 litigation.

25       Further, defendant's request is interposed in bad faith, as  
26 defendant has full and complete access to the "Armstrong file"  
27 and indeed, Corydon and his attorney submitting these  
28

1 interrogatories have had exclusive access to said file by  
2 order of the Armstrong court.

3 Interrogatory No. 74: IDENTIFY any and all DOCUMENTS  
4 located in the ARMSTRONG file that in any way discuss, describe,  
5 mention or refer to transmitting information to the media, as a  
6 third person, including but not limited to lying, spreading  
7 rumors, black propaganda and "noisy" investigations of  
8 individuals believed to be adverse to the Church of Scientology  
9 and/or its practices.

10 Response to No. 74: Plaintiff objects to this  
11 interrogatory as it exceeds the limit of 35 interrogatories  
12 specified by California Code of Civil Procedure section  
13 2030(c)(1). There are no circumstances which warrant a greater  
14 number under Code of Civil Procedure section 2030(c)(2).  
15 Further, plaintiff objects as the interrogatory is vague,  
16 ambiguous, unintelligible, overbroad and burdensome. Plaintiff  
17 further objects on the grounds that the subject matter of the  
18 interrogatory is irrelevant and not calculated to lead to the  
19 discovery of admissible evidence. Plaintiff further objects as  
20 the interrogatory seeks to invade the rights of freedom of  
21 association, religion and privacy under state and federal law.  
22 Further, plaintiff is under no obligation to perform research  
23 for defendant. Last, defendant's request is taken in bad faith,  
24 frivolous and intended solely to harass plaintiff in violation  
25 of California Code of Civil Procedure section 128.5. Without  
26 waiving the foregoing objections, plaintiff has no knowledge of  
27 or access to the court file in Church of Scientology of  
28



1 California v. Armstrong, Los Angeles Superior Court No.  
2 C420153 or documents related to the subject matter of that  
3 litigation.

4 Further, defendant's request is interposed in bad faith, as  
5 defendant has full and complete access to the "Armstrong file"  
6 and indeed, Corydon and his attorney submitting these  
7 interrogatories have had exclusive access to said file by  
8 order of the Armstrong court.

9 Interrogatory No. 75: Payments by Religious Technology  
10 Center, Author Services Inc. or any other Church of Scientology  
11 related corporation or entity to L. Ron Hubbard.

12 Response to No. 75: Plaintiff objects to this  
13 interrogatory as it exceeds the limit of 35 interrogatories  
14 specified by California Code of Civil Procedure section  
15 2030(c)(1). There are no circumstances which warrant a greater  
16 number under Code of Civil Procedure section 2030(c)(2).  
17 Further, plaintiff objects as the interrogatory is vague,  
18 ambiguous, unintelligible, overbroad, burdensome and consists of  
19 a statement and not an interrogatory. Last, defendant's request  
20 is taken in bad faith, frivolous and intended solely to harass  
21 plaintiff in violation of California Code of Civil Procedure  
22 section 128.5.

23 Interrogatory No. 76: IDENTIFY any and all DOCUMENTS  
24 located in the ARMSTRONG file that in any way discuss, describe,  
25 mention or refer to payments by Religious Technology Center,  
26 Author Services Inc. or any other Church of Scientology related  
27 corporation or entity to L. Ron Hubbard.

1        Response to No. 76: Plaintiff objects to this  
2        interrogatory as it exceeds the limit of 35 interrogatories  
3        specified by California Code of Civil Procedure section  
4        2030(c)(1). There are no circumstances which warrant a greater  
5        number under Code of Civil Procedure section 2030(c)(2).  
6        Further, plaintiff objects as the interrogatory is vague,  
7        ambiguous, unintelligible, overbroad and burdensome. Plaintiff  
8        further objects on the grounds that the subject matter of the  
9        interrogatory is irrelevant and not calculated to lead to the  
10       discovery of admissible evidence. Plaintiff further objects as  
11       the interrogatory seeks to invade the rights of freedom of  
12       association, religion and privacy under state and federal law.  
13       Further, plaintiff is under no obligation to perform research  
14       for defendant. Last, defendant's request is taken in bad faith,  
15       frivolous and intended solely to harass plaintiff in violation  
16       of California Code of Civil Procedure section 128.5. Without  
17       waiving the foregoing objections, plaintiff has no knowledge of  
18       or access to the court file in Church of Scientology of  
19       California v. Armstrong, Los Angeles Superior Court No.  
20       C420153 or documents related to the subject matter of that  
21       litigation.

22       Further, defendant's request is interposed in bad faith, as  
23       defendant has full and complete access to the "Armstrong file"  
24       and indeed, Corydon and his attorney submitting these  
25       interrogatories have had exclusive access to said file by  
26       order of the Armstrong court.

27       Interrogatory No. 77: As to the "Exhibits to Declaration  
28

1 of Bent Corydon re Scientology Documents seized by the FBI read  
2 by Mr. Corydon prior to Subject Broadcast" filed in support of  
3 Mr. Corydon's summary judgment motion in Judicial Council  
4 Coordination Proceeding no. 2151, IDENTIFY, by stamped number  
5 at the bottom of each page each such DOCUMENT you contend is not  
6 a true and accurate copy of a DOCUMENT seized by agents of the  
7 FBI, or other government agents, from Church of Scientology  
8 facilities.

9       Response to No. 77: Plaintiff objects to this  
10 interrogatory as it exceeds the limit of 35 interrogatories  
11 specified by California Code of Civil Procedure section  
12 2030(c)(1). There are no circumstances which warrant a greater  
13 number under Code of Civil Procedure section 2030(c)(2).  
14 Further, plaintiff objects as the interrogatory is vague,  
15 ambiguous, unintelligible, overbroad and burdensome. Plaintiff  
16 further objects on the grounds that the subject matter of the  
17 interrogatory is irrelevant and not calculated to lead to the  
18 discovery of admissible evidence. Last, defendant's request is  
19 taken in bad faith, frivolous and intended solely to harass  
20 plaintiff in violation of California Code of Civil Procedure  
21 section 128.5. Without waiving the foregoing objections,  
22 plaintiff responds that he is unable to confirm or not confirm  
23 what was allegedly obtained by government representatives from  
24 "Church of Scientology facilities."

25       Interrogatory No. 78: As to the "Exhibits to Declaration  
26 of Bent Corydon re Scientology Documents seized by the FBI read  
27 by Mr. Corydon prior to Subject Broadcast" filed in support of  
28



1 Mr. Corydon's summary judgment motion in Judicial Council  
2 Coordination Proceeding number 2151, IDENTIFY, by stamped number  
3 at the bottom of each page, each DOCUMENT you contend is not a  
4 true and accurate copy of Scientology authored DOCUMENT, and by  
5 the listed author, should an author be so indicated.

6 Response to No. 78: Plaintiff objects to this  
7 interrogatory as it exceeds the limit of 35 interrogatories  
8 specified by California Code of Civil Procedure section  
9 2030(c)(1). There are no circumstances which warrant a greater  
10 number under Code of Civil Procedure section 2030(c)(2).  
11 Further, plaintiff objects as the interrogatory is vague,  
12 ambiguous, unintelligible, overbroad and burdensome. Plaintiff  
13 further objects on the grounds that the subject matter of the  
14 interrogatory is irrelevant and not calculated to lead to the  
15 discovery of admissible evidence. Last, defendant's request is  
16 taken in bad faith, frivolous and intended solely to harass  
17 plaintiff in violation of California Code of Civil Procedure  
18 section 128.5. Without waiving said objections, plaintiff  
19 responds that is not qualified to and lacks knowledge enabling  
20 him to respond to the interrogatory.

21  
22 Dated: January 10, 1989

Respectfully submitted,

23  
24 By: 

Timothy Bowles

25 Attorney for Plaintiff  
26 Heber Jentzsch  
27  
28

PROOF OF SERVICE

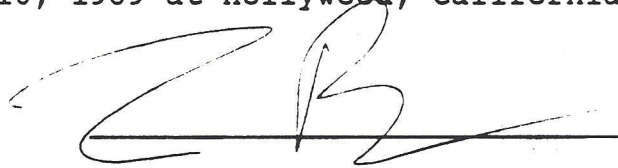
STATE OF CALIFORNIA       )  
                                  ) ss.  
COUNTY OF LOS ANGELES    )

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Blvd., Suite 2000, Hollywood, CA, 90028.

On January 10, 1989, I served the foregoing document described as RESPONSES OF REVEREND HEBER JENTZSCH TO DEFENDANT'S INTERROGATORIES (FOURTH SET) on interested parties in this action by delivering a true copy thereof enclosed in a sealed envelope, postage prepaid in the United States mail addressed as follows:

PAUL MORANTZ  
ATTORNEY AT LAW  
P.O. Box 511  
Pacific Palisades, CA 90272

Executed on January 10, 1989 at Hollywood, California.

A handwritten signature in black ink, appearing to be 'PM' or 'P. Morantz', written over a horizontal line.